

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address

Lynda T. Bui, Trustee
3550 Vine Street, Suite 210
Riverside, California 92507
Telephone: (949) 340-3400
Facsimile: (949) 340-3000
Email: trustee.bui@shulmanbastian.com

FOR COURT USE ONLY

☒ Individual appearing without attorney
☐ Attorney for:

UNITED STATES BANKRUPTCY COURT

MARTA PATRICIA RODRIGUEZ aka
MARTA P. RODRIGUEZ aka
PATTY RODRIGUEZ,

Debtor(s).

CHAPTER: 7

NOTICE OF SALE OF ESTATE PROPERTY

Sale Date:

Time:

Location:☒ Public☐ Private

Last date to file objections: 06/06/2022

Approximately 117,000 miles; stored in parking garage.

Terms and conditions of sale: See attached Statement of Information in Compliance with LBR 6004-1(c)(3).

Proposed sale price: at least \$7,500.00

Overbid procedure (if any): Trustee to sell the Mercedes by any reasonable means, on an all cash basis and an as-is basis, as long as the Estate receives not less than \$7,500.00 gross for the Mercedes.

If property is to be sold free and clear of liens or other interests, list date, time and location of hearing:

To be sold free and clear of liens but no hearing is scheduled

Contact person for potential bidders (include name, address, telephone, fax and/or email address):

Lynda T. Bui

Chapter 7 Trustee

3550 Vine Street, Suite 210

Riverside, California 92507

Telephone: (949) 340-3400

Facsimile: (949) 340-3000

Email: trustee.bui@shulmanbastian.com

Date: 05/19/2022

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Lynda T. Bui, Trustee 3550 Vine Street, Suite 210 Riverside, California 92507 Telephone: (949) 340-3400 Facsimile: (949) 340-3000 Email: trustee.bui@shulmanbastian.com Chapter 7 Trustee <input type="checkbox"/> Debtor(s) appearing without an attorney <input type="checkbox"/> Attorney for:	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - RIVERSIDE DIVISION	
In re: MARTA PATRICIA RODRIGUEZ aka MARTA P. RODRIGUEZ aka PATTY RODRIGUEZ,	CASE NO.: 6:21-bk-16068-SY CHAPTER: 7
	NOTICE OF OPPORTUNITY TO REQUEST A HEARING ON MOTION [LBR 9013-1(o)]
Debtor(s).	[No hearing unless requested in writing]

TO THE U.S. TRUSTEE AND ALL PARTIES ENTITLED TO NOTICE, PLEASE TAKE NOTICE THAT:

1. Movant(s) Lynda T. Bui, solely in her capacity as the Chapter 7 Trustee, filed a motion or application (Motion) entitled Chapter 7 Trustee's Motion for Order Approving the Procedure for the Sale of Personal Property of the Estate (2014 Mercedes-Benz E-350 Wagon) Pursuant to Bankruptcy Code §§ 363(b)(1) and (f).
2. Movant(s) is requesting that the court grant the Motion without a hearing as provided for in LBR 9013-1(o), unless a party in interest timely files and serves a written opposition to the Motion and requests a hearing.
3. The Motion is based upon the legal and factual grounds set forth in the Motion. (*Check appropriate box below*):
☒ The full Motion is attached to this notice; or
☐ The full Motion was filed with the court as docket entry # _____, and a detailed description of the relief sought is attached to this notice.
4. **DEADLINE FOR FILING AND SERVING OPPOSITION PAPERS AND REQUEST FOR A HEARING:** Pursuant to LBR 9013-1(o), any party who opposes the Motion may request a hearing on the Motion. The deadline to file and serve a written opposition and request for a hearing is 14 days after the date of service of this notice, plus 3 additional days if you were served by mail or pursuant to F.R.Civ.P. 5(b)(2)(D) or (F).

- a. If you timely file and serve a written opposition and request for a hearing, movant will file and serve a notice of hearing at least 14 days in advance of the hearing. [LBR 9013-1(o)(4)]
- b. If you fail to comply with this deadline:
 - (1) Movant will file a declaration to indicate: (1) the Motion was properly served, (2) the response period elapsed, and (3) no party filed and served a written opposition and request for a hearing within 14 days after the date of service of the notice [LBR 9013-1(o)(3)];
 - (2) Movant will lodge an order that the court may use to grant the Motion; and
 - (3) The court may treat your failure as a waiver of your right to oppose the Motion and may grant the Motion without further hearing and notice. [LBR 9013-1(h)]

Respectfully submitted,

Date: 05/19/2022

/s/ Lynda T. Bui

Signature of Movant or attorney for Movant

Lynda T. Bui

Printed name of Movant or attorney for Movant

**Statement of Information
in Compliance with LBR 6004-1(c)(4)**

Statement of Information in Compliance with LBR 6004-1(c)(4)

<u>LBR 6004-1(c)(4) Requirement</u>	<u>Information</u>
<i>LBR 6004-1(c)(3)(B)</i> Name and address of the proposed buyer:	There is currently no proposed buyer. After reaching out to Carvana and Carmax and offering to sell the Mercedes, the Trustee received an offer from Carmax of \$11,000.00 and an offer from Carvana of \$11,408.00. However, the offers were only good for seven days after they were presented to the Trustee. The Trustee believes that she can sell the Mercedes for approximately \$10,000.00 but for no less than \$7,500.00.
<i>LBR 6004-1(c)(3)(C)</i> Description of the property to be sold:	2014 Mercedes-Benz E-350 Wagon ("Mercedes"); regularly maintained and in good condition; approximately 117,000 miles; Mercedes will be safely stored until sale is completed.
<i>LBR 6004-1(c)(3)(D)</i> Terms and conditions of the proposed sale, including the price and all contingencies:	The sale shall be conducted on an all cash basis and an as-is basis, as long as the Estate receives not less than \$7,500.00 in gross for the Mercedes. The sale shall be without any warranties, representations or contingencies.
<i>LBR 6004-1(c)(3)(E)</i> Whether the proposed sale is free and clear of liens, claims or interests, or subject to them, and a description of all such liens, claims or interests:	<p>The Mercedes is subject to the lien of Mercedes-Benz Financial Services ("Mercedes-Benz") in the approximate amount of \$1,326.00.</p> <p>The sale will be free and clear of liens, claims and interests of third parties, with such liens, claims and interests to attach to the sale proceeds pending further Court order. Subject to Court approval, from the proceeds from the sale of the Mercedes, the Trustee will pay Mercedes-Benz an amount that is sufficient to satisfy their secured claim against the Mercedes.</p>
<i>LBR 6004-1(c)(3)(F)</i> Whether the proposed sale is subject to higher and better bids:	Yes to the extent the Trustee receives a higher offer.
<i>LBR 6004-1(c)(3)(G)</i> Consideration to be received by the Estate, including estimated commissions, fees and other costs of sale:	The Estate is expected to receive no less than \$7,500.00 in gross.
<i>LBR 6004-1(c)(3)(H)</i> If authorization is sought to pay commission, the identity of the auctioneer, broker, or sales agent and the amount or percentage of the proposed commission to be paid:	Not applicable.
<i>LBR 6004-1(c)(3)(I)</i> A description of the estimated or possible tax consequences to the Estate, if known, and how any tax liability generated by the sale of the property will be paid:	The Trustee believes there will be no tax liability from the sale because she is informed that the Mercedes is being sold for less than the Debtor's purchase price for the Mercedes and there will be no gain from the sale.

<u>LBR 6004-1(c)(4) Requirement</u>	<u>Information</u>
<i>LBR 6004-1(c)(4)(A)</i> Date which objection must be filed and served:	A written objection to the proposed sale, together with a request for hearing, must be filed and served pursuant to LBR 9013-1(o) not later than 14 days from the date of service of the notice of the Sale Motion, plus an additional three (3) days unless the Notice was served by personal delivery or posting as described in F.R.Civ.P. 5(b)(2)(A)-(B), in the form required by Local Bankruptcy Rule 9013-1(f)(1). Failure to file a timely response may be deemed as consent to the relief requested in the Sale Motion.
<i>LBR 6004-1(c)(4)(B)</i>	In the absence of an objection, an order may be entered authorizing the sale of the Mercedes without further notice or hearing.

1 Lynda T. Bui, Trustee
3550 Vine Street, Suite 210
2 Riverside, California 92507
Telephone: (949) 340-3400
3 Facsimile: (949) 340-3000
Email: trustee.bui@shulmanbastian.com
4

5 Chapter 7 Trustee
6
7

8 **UNITED STATES BANKRUPTCY COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA, RIVERSIDE DIVISION**
10

11 In re

12 **MARTA PATRICIA RODRIGUEZ** aka
13 **MARTA P. RODRIGUEZ** aka
PATTY RODRIGUEZ,

14 Debtor.
15
16
17
18

Case No. 6:21-bk-16068-SY

Chapter 7

**CHAPTER 7 TRUSTEE'S MOTION FOR
ORDER APPROVING THE PROCEDURE
FOR THE SALE OF PERSONAL
PROPERTY OF THE ESTATE (2014
MERCEDES-BENZ E-350 WAGON)
PURSUANT TO BANKRUPTCY CODE §§
363(b)(1) AND (f); AND DECLARATION
OF LYNDA T. BUI IN SUPPORT THEREOF**

[No Hearing Required Pursuant to
LBR 9013-1(o)]

19 **TO THE HONORABLE SCOTT H. YUN, UNITED STATES BANKRUPTCY JUDGE, THE**
20 **OFFICE OF THE UNITED STATES TRUSTEE, THE DEBTOR AND CREDITORS, AND**
21 **OTHER INTERESTED PARTIES AND THEIR COUNSEL OF RECORD:**

22 Lynda T. Bui ("Trustee"), the duly appointed, qualified and acting Chapter 7 trustee
23 for the bankruptcy estate ("Estate") of Marta Patricia Rodriguez aka Marta P. Rodriguez
24 aka Patty Rodriguez ("Debtor"), brings this *Motion for Order Approving the Procedure for*
25 *the Sale of Personal Property of the Estate (2014 Mercedes-Benz E-350 Wagon¹)*
26
27

28 ¹ The Trustee is filing two similar motions for two different vehicles. This Sale Motion is for the 2014 Mercedes-Benz which has a secured claim.

1 Pursuant to Bankruptcy Code §§ 363(b)(1) and (f) ("Sale Motion") and respectfully
2 represents as follows:

3 **I. RELEVANT FACTS**

4 The Debtor's assets include the community interest in a 2014 Mercedes-Benz E-
5 350 Wagon ("Mercedes"). In her Amended Schedule A/B filed on March 30, 2022 (docket
6 20), the Debtor valued the Mercedes at \$14,423.00 and did not claim an exemption in the
7 Mercedes. In her Schedule D, the Debtor listed a lien against the Mercedes in favor of
8 Mercedes-Benz Financial Services ("Mercedes-Benz") in the amount of \$644.64. However,
9 the Trustee is informed that the current amount due and owing to Mercedes-Benz is
10 approximately \$1,326.00.

11 The Trustee is informed that the Mercedes has been regularly maintained, is in good
12 condition and has approximately 117,000 miles on it. The Debtor and/or her separated
13 spouse has advised the Trustee through counsel that they will cooperate with the turnover
14 of the Mercedes for its administration.

15 After reaching out to Carvana and Carmax and offering to sell the Mercedes, the
16 Trustee received an offer from Carmax of \$11,100.00 and an offer from Carvana of
17 \$11,408.00. However, these offers were only good for seven days after they were
18 presented to the Trustee. The Trustee believes that she can sell the Mercedes for
19 approximately \$10,000.00 and will continue to seek the highest and best sales price for the
20 Mercedes, but will need a Bankruptcy Court order.

21 **II. ARGUMENT**

22 Given the increase in value of used cars recently² and the ease of which they can
23 be sold without utilizing an auctioneer, the Trustee determined that it may be beneficial to
24 creditors of the Estate if she administers the Mercedes by using the sale process online
25 without the need for an auctioneer, which the Estate would generally have to pay 25%
26 commission of the gross sales price. The sale shall be without any warranties,
27

28

29 ² The Trustee acknowledges that used car prices are currently trending down.

1 representations or contingencies, free and clear of liens, claims and interests of third
2 parties, with such liens, claims and interests to attach to the sale proceeds pending further
3 Court order. In order to obtain the best price for the Mercedes, the Trustee seeks a Court
4 order authorizing the Trustee to sell it by any reasonable means (such as soliciting local
5 dealers in the area or online auction sites used for vehicles) on an all cash and an as-is
6 basis for no less than \$7,500.00.³

7 The sale is authorized by Bankruptcy Code section 363(f)⁴ and will provide for a
8 cost-efficient and expeditious manner in which to administer the Mercedes. The Estate is
9 expected to be able to sell the Mercedes for not less than \$7,500.00 if this Sale Motion is
10 approved. If the Sale Motion is not approved, the Estate may have difficulty marketing the
11 Mercedes for sale and may have to abandon the Mercedes as being burdensome, which
12 would result in no benefit for the Estate. Accordingly and based on the Trustee's business
13 judgment, the Trustee respectfully requests that the Court approve the Sale Motion.

14 Through this Motion, the Trustee is also seeking approval to pay a monthly fee for
15 the storage of the Mercedes, if necessary, until such time that it can be sold. The Trustee
16 has reached out to ACE Parking ("ACE") who operates the parking structure in the building
17 where the Trustee's Irvine office is located as well as surrounding buildings in the area.

18 _____
19 ³ The purpose for the request for the lower sale price is to provide the Estate with a cushion should the
20 market change and to obviate the need to incur costs to obtain another sale order based on a different sale
21 price.

22 ⁴ The duties of a trustee in a Chapter 7 filing are enumerated in 11 U.S.C. §704, which provides in relevant
23 part as follows:

24 (a) The trustee shall—

(1) collect and reduce to money the property of the estate for which such
trustee serves, and close such estate as expeditiously as is compatible with
the best interests of parties in interest;

(2) be accountable for all property received;

11 U.S.C. §704(a).

25 Further, the Trustee, after notice and hearing, may sell property of the estate. 11 U.S.C. § 363(b). Courts
26 ordinarily will approve a proposed sale if there is a good business reason for the sale and the sale is in the
27 bests interests of the estate. *In re Wilde Horse Enterprises, Inc.*, 136 B.R. 830, 841 (Bankr. C.D. Cal. 1991);
28 *In re Lionel Corp.*, 722 F.2d 1063, 1069 (2d Cir. 1983). In this case, the net proceeds will depend on the sale
price. If the Mercedes sells for \$11,000, for example, the anticipated *net* the Estate will be approximately
\$9,500. If, however, the Mercedes sells for \$7,500, then the expected net to the Estate will be approximately
\$6,000.

ACE has a vehicle storage program which is located at 20 Pacifica, Irvine, CA and charges \$95.00 per month for storage. The Trustee has searched for other storage options for the Mercedes and this option is the best one available. The Trustee anticipates that the Mercedes will be stored for no more than four months and requests reimbursement of not to exceed four months of storage fees or \$380.00. The Trustee reserves the right to pay the storage fees to the Debtor or another third party if she determines based on her business judgment that storing the Mercedes at that location is in the best interest of the Estate. Based upon an analysis of the sale of the Mercedes, the Trustee is of the opinion and belief that the proposed sale procedure is in the best interest of the Estate, as it will generate the most funds to the Estate for the benefit of unsecured creditors.

Pursuant to Local Bankruptcy Rule 6004-1(g), once the sale closes, the Trustee will file with the Court a *Report of Sale* which details the sale terms approved and the identity of the buyer.

III. APPROVING THE MOTION WITHOUT A HEARING IS PROPER

Local Bankruptcy Rule 9013-1(o)(1) provides as follows:

(1) Matters That May Be Determined Upon Notice of Opportunity to Request Hearing. Except as to matters specifically noted in subsection (o)(2) below, and as otherwise ordered by the court, any matter that may be set for hearing in accordance with LBR 9013-1(d) may be determined upon notice of opportunity to request a hearing.

Further Section 102(1)(B) of the Bankruptcy Code provides that “after notice and a hearing”, or a similar phrase –

(B) authorizes an act without an actual hearing if such notice is given properly and if –

(i) such a hearing is not requested timely be a party in interest; or

(ii) there is insufficient time for a hearing to be commenced before such act must be done, and the court authorizes such act.

See 11 U.S.C. § 102(1)(B).

1 The Trustee believes that the Local Bankruptcy Rule 9013-1(o)(1) procedure is
2 appropriate in this case as she does not anticipate any opposition to the Sale Motion. Thus,
3 the procedure will save the Estate the fees and costs associated with conducting a hearing
4 on approval of a matter that Trustee anticipates will not be opposed.

5 **IV. CONCLUSION**

6 Based upon the foregoing, the Trustee respectfully submits that good cause exists
7 for granting the Sale Motion and requests that the Court enter an order which provides as
8 follows:

9 1. Authorizing the Trustee to sell the Mercedes by any reasonable means, on
10 an all cash basis and an as-is basis, as long as the Estate receives not less than \$7,500.00
11 for the Mercedes. The sale shall be without any warranties, representations or
12 contingencies, free and clear of liens, claims and interests of third parties, with such liens,
13 claims and interests to attach to the sale proceeds pending further Court order.

14 2. Authorize the Trustee to execute any and all documents to effectuate the sale
15 of the Mercedes as proposed in the Sale Motion.

16 3. From the proceeds from the sale of the Mercedes, authorize the Trustee to
17 pay Mercedes an amount that is sufficient to satisfy its secured claim asserted against the
18 Mercedes.

19 4. Authorize the Trustee to reimburse either the Debtor or a third party for the
20 costs of storage of the Mercedes in an amount not to exceed \$380.00.

21 5. Trustee's compliance with Local Bankruptcy Rule 6004-1(g) to file a Report
22 of Sale detailing the terms of sale with the Court once the sale closes.

23 6. For such other and further relief as the Court deems just and proper under
24 the circumstances of this case.

25 Dated: May 19, 2022

26 /s/ Lynda T. Bui
27 Lynda T. Bui
28 Chapter 7 Trustee for the bankruptcy estate of
Rodriguez aka Patty Rodriguez

DECLARATION OF LYNDA T. BUI

I, Lynda T. Bui, declare and state as follows:

1. I am the Chapter 7 trustee for the bankruptcy estate of *In re Marta Patricia Rodriguez aka Marta P. Rodriguez aka Patty Rodriguez* ("Debtor"), Case No. 6:21-bk-16068-SY. I have personal knowledge of the facts set forth in this Declaration and could, if called as a witness, competently testify thereto.

2. I am familiar with the Debtor's bankruptcy proceeding and make this Declaration in support of my *Motion for Order Approving the Procedure for the Sale of Personal Property of the Estate (2014 Mercedes-Benz E-350 Wagon) Pursuant to Bankruptcy Code §§ 363(b)(1) and (f)* ("Sale Motion"). All capitalized terms not otherwise defined herein shall have the meaning set forth in the Sale Motion.

3. The Debtor's assets include the community interest in a 2014 Mercedes-Benz E-350 Wagon ("Mercedes"). In her Amended Schedule A/B filed on March 30, 2022 (docket 20), the Debtor valued the Mercedes at \$14,423.00. In her Schedule D, the Debtor listed a lien against the Mercedes in favor of Mercedes-Benz Financial Services ("Mercedes-Benz") in the amount of \$644.64. However, I am informed that the current amount due and owing to Mercedes-Benz is approximately \$1,326.00. The Debtor's separate spouse is in possession of the Mercedes. Through counsel, they have advised that they wish to surrender the Mercedes and will cooperate in the process.

4. I have been advised that the Mercedes has been regularly maintained, is in good condition and has approximately 117,000 miles on it. Attached here as **Exhibit 1** are pictures of the Mercedes.

5. I intend to have the Mercedes placed in storage until such time that it can be sold. I am uncertain about the car market and will need to continue to market the Mercedes for sale once the Court grants this Motion in an effort to obtain the best and highest value for the Estate.

6. I have reached out to ACE Parking ("ACE") who operates the parking structure in the building where my Irvine office is located as well as surrounding buildings

1 in the Irvine Spectrum area. I was informed that ACE has a vehicle storage program which
2 is located at 20 Pacifica, Irvine, CA and charges \$95.00 per month for storage. I have
3 searched for other storage options and this option is the best one available currently. I
4 anticipate that the Mercedes will be stored, if necessary, for no more than four months and
5 request reimbursement of not to exceed four months of storage fees or \$380.00.

6 7. After reaching out to Carvana and Carmax and offering to sell the Mercedes,
7 I received an offer from Carmax of \$11,100.00 and an offer from Carvana of \$11,408.00.
8 However, these offers were only good for seven days after they were presented to me. I
9 believe that I can sell the Mercedes for approximately \$10,000.00 but will need a
10 Bankruptcy Court order before I reach back out to Carmax or Carvana for a new offer and
11 such offer may not be the same.

12 8. In order to obtain the best price for the Mercedes, I seek a Court order
13 authorizing me to sell the Mercedes by any reasonable means (such as soliciting local
14 dealers in the area or auction sites used for vehicles) on an all cash basis and an as-is
15 basis, as long as the Estate can sell it for not less than \$7,500.00. I am giving the Estate
16 extra cushion in case the market on used vehicles changes in the near future or that there
17 is a delay because the Estate and the Debtor cannot gather all the necessary documents
18 or items to consummate the sale. Consistent with my duties, my goal is to obtain the highest
19 and best price for the Mercedes to maximize benefits to the Estate. The sale shall be
20 without any warranties, representations or contingencies, free and clear of liens, claims
21 and interests of third parties, with such liens, claims and interests to attach to the sale
22 proceeds pending further Court order.

23 9. Based upon an analysis of the sale of the Mercedes, it is my opinion and
24 belief that the proposed sale procedure is in the best interest of the Estate, as it will
25 generate the most funds to the Estate for the benefit of unsecured creditors.

26 10. Pursuant to Local Bankruptcy Rule 6004-1(g), once the sale closes, I will file
27 with the Court a *Report of Sale* which details the sale terms approved and the identity of
28 the buyer.

1 11. If the Sale Motion is not approved, the Estate may have difficulty marketing
2 the Mercedes for sale and may have to abandon the Mercedes as being burdensome,
3 which would result in no benefit for the Estate. Accordingly and based on my business
4 judgment, I respectfully request that the Court approve the Sale Motion.

5 I declare under penalty of perjury pursuant to the laws of the United States of
6 America that the foregoing is true and correct.

7 EXECUTED on May 19, 2022, at Irvine, California.

8 */s/ Lynda T. Bui*

9 Lynda T. Bui

EXHIBIT 1





EXHIBIT "1"







EXHIBIT "1"



PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
100 Spectrum Center Drive, Suite 600, Irvine, CA 92618

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF SALE OF ESTATE PROPERTY** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **May 19, 2022**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Chapter 7 Trustee:** Lynda T. Bui (TR) trustee.bui@shulmanbastian.com, C115@ecfbis.com
- **Attorney for Debtor:** Robert L Firth attyrfirth@hotmail.com, avazfirthlaw@gmail.com
- **Interested Party:** Ryan Forrest POCInquiries@bonialpc.com
- **Interested Party:** United States Trustee (RS) ustpreion16.rs.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) **May 19, 2022**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

May 19, 2022
Date

Erlanna Lohayza
Printed Name

/s/ Erlanna Lohayza
Signature

U.S. MAIL SERVICE LIST

DEBTOR

MARTA PATRICIA RODRIGUEZ
29805 COTTONWOOD COVE
DRIVE
MENIFEE, CA 92584-7977

NEF - ATTORNEY FOR DEBTOR

ROBERT L FIRTH
68910 ADELINA ROAD
CATHEDRAL CITY, CA 92234-3747

NEF - INTERESTED PARTY

UNITED STATES TRUSTEE (RS)
3801 UNIVERSITY AVENUE, SUITE
720
RIVERSIDE, CA 92501-3255

CREDITOR LISTING

EMPLOYMENT DEVELOPMENT
DEPT.
BANKRUPTCY GROUP MIC 92E
P.O. BOX 826880
SACRAMENTO, CA 94280-0001

CREDITOR LISTING

FRANCHISE TAX BOARD
BANKRUPTCY SECTION MS: A-340
P.O. BOX 2952
SACRAMENTO, CA 95812-2952

CREDITOR LISTING

TOYOTA MOTOR CREDIT
CORPORATION
PO BOX 8026
CEDAR RAPIDS IA 52408-8026

CREDITOR LISTING

TOYOTA MOTOR CREDIT
CORPORATION
14841 DALLAS PKWY SUITE 425
DALLAS, TX 75254-8067

CREDITOR LISTING

ALTURA CREDIT UNION
ATTN: BANKRUPTCY DEPT.
2847 CAMPUS PARKWAY
RIVERSIDE, CA 92507-0906

CREDITOR LISTING

BANK OF AMERICA
PO BOX 982238
EL PASO TX 79998-2238

CREDITOR LISTING

BARCLAYS BANK DELAWARE
ATTN: BANKRUPTCY DEPT.
PO BOX 8801
WILMINGTON, DE 19899-8801

CREDITOR LISTING

CAHP CREDIT UNION
2843 MANLOVE RD
SACRAMENTO CA 95826-3248

CREDITOR LISTING

CAPITAL ONE/NEIMAN MARCUS
ATTN: BANKRUPTCY CLAIMS
SERVICER
P.O. BOX 30285
SALT LAKE CITY, UT 84130-0285

CREDITOR LISTING

CAVALRY SPV I, LLC
PO BOX 4252
GREENWICH, CT 06831-0405

PREFERRED ADDRESS

JPMORGAN CHASE BANK N A
BANKRUPTCY MAIL INTAKE TEAM
700 KANSAS LANE FLOOR 01
MONROE LA 71203-4774

CREDITOR LISTING

COMENITY BANK - LOFT
ATTN: BANKRUPTCY DEPT.
P.O. BOX 182125
COLUMBUS, OH 43218-2125

CREDITOR LISTING

COMENITY BANK - NEW YORK &
CO.
ATTN: BANKRUPTCY DEPT.
P.O. BOX 182125
COLUMBUS, OH 43218-2125

CREDITOR LISTING

COMENITY BANK - VICTORIA'S
SECRET
ATTN: BANKRUPTCY DEPT.
P.O. BOX 182125
COLUMBUS, OH 43218-2125

CREDITOR LISTING

EDFINANCIAL SERVICES
ATTN: BANKRUPTCY DEPT.
P.O. BOX 36008
KNOXVILLE, TN 37930-6008

CREDITOR LISTING

IRS
BANKRUPTCY WEST
P.O. BOX 7346
PHILADELPHIA, PA 19101-7346

CREDITOR LISTING

JPMORGAN CHASE BANK, N.A.
S/B/M/T CHASE BANK USA, N.A.
C/O NATIONAL BANKRUPTCY
SERVICES, LLC
P.O. BOX 9013
ADDISON, TX 75001-9013

CREDITOR LISTING

KOHL'S
ATTN: BANKRUPTCY DEPT.
P.O. BOX 3043
MILWAUKEE, WI 53201-3043

PREFERRED ADDRESS

MERCEDES BENZ FINANCIAL
SERVICES
13650 HERITAGE PARKWAY
FORT WORTH TX 76177-5323

CREDITOR LISTING

MIDLAND CREDIT MANAGEMENT,
INC.
PO BOX 2037
WARREN, MI 48090-2037

CREDITOR LISTING

MIDLAND FUNDING
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CREDITOR LISTING

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PORTFOLIO RECOVERY -
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SUITE 100
NORFOLK, VA 23502-4952

PREFERRED ADDRESS

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DEBT MANAGEMENT SERVICES
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RETURNED MAIL

N/A

RIVERSIDE DIVISION
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N/A

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DUPLICATE

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